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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 **-oOo-**

10 UNITED STATES OF AMERICA, ) 2:11-cr-0310-JCM-RJJ  
11 Plaintiff, ) JOINT PROTECTIVE ORDER RE:  
12 vs ) VIDEO RECORDINGS OF UNDERCOVER  
13 JACOB LILL; ) TRANSACTIONS (AMENDED TO ADD  
14 EDMUND SCHROBACK; ) ATTORNEY GABRIEL GRASSO)  
15 CHRISTOPHER GREEN; )  
16 KYLE LAIR; and )  
17 ANA MARTINEZ )  
18 \_\_\_\_\_ )  
Defendants )

19 The parties having met and conferred regarding the content of video recordings to be  
20 released as supplemental discovery in this matter, hereby agree that the Government, upon this  
21 Court's approval of this Protective Order, will release to undersigned defense counsel within ten (10)  
22 days, supplemental discovery including video recordings of controlled purchases of marijuana by  
undercover agents.

23 By signing this Protective Order, defense counsel agree that the above-referenced  
24 materials will be maintained by their offices and associates in the strictest confidence. Access to these  
25 materials will be limited to counsel, defendants, investigators, paralegals, experts and other  
26 individuals who have been retained or appointed by the Court to represent the defendants, and who

1 will be provided a copy of this Order. Counsel further agree that these materials will not be copied  
2 or publically disseminated (other than for use directly in court proceedings). Furthermore, copies of  
3 the videos may not be provided directly to the individual Defendants, including the Defendants who  
4 are parties to this agreement, until such time as the Government agrees to such disclosure and/or it  
5 is ordered by the Court.

6 For parties who are not signatories to this agreement, copies of these materials will be  
7 maintained at the United States Attorneys Office, where they have been made available for viewing.  
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9 Respectfully Submitted this 6<sup>th</sup> day of June, 2012.

10 DANIEL G. BOGDEN  
11 United States Attorney

12 /s

13 Bradley W. Giles  
14 Assistant United States Attorney

15 Dated: 5/31/12 /s  
16 Michael Cristalli  
17 Attorney for: Jacob Lill

18 Dated: 5/31/12 /s  
19 Paola M. Armeni  
20 Attorney for: Edmund Schrobback

21 Dated: 5/31/12 /s  
22 Mace J. Yampolsky  
23 Attorney for: Christopher Green

24 Dated: 5/31/12 /s  
25 Karen Winckler  
26 Attorney for: Kyle Lair

27 Dated: 6/6/12 /s  
28 Gabriel Grasso  
29 Attorney for: Ana Martinez

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5 **UNITED STATES DISTRICT COURT**  
6 **DISTRICT OF NEVADA**

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8 UNITED STATES OF AMERICA ) 2:11-cr-0310-JCM-RJJ  
9 Plaintiff, )  
10 vs ) PROTECTIVE ORDER RE: VIDEO  
11 ) RECORDINGS OF UNDERCOVER  
12 JACOB LILL; ) TRANSACTIONS  
13 EDMUND SCHROBACK; )  
14 CHRISTOPHER GREEN; )  
15 KYLE LAIR; and )  
ANA MARTINEZ )  
Defendants )  
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17 Based on the pending stipulation of the parties, and good cause appearing therefore,

18 **IT IS HEREBY ORDERED** that:

19 Ten days from the date of this Order, the Government shall release to signatory defense  
20 counsel supplemental discovery including video recordings of controlled purchases of marijuana by  
21 undercover agents.

22 **IT IS FURTHER ORDERED** that:

23 The video recordings released pursuant to the supplemental discovery package shall  
24 be maintained in the strictest confidence. Access to the recordings shall be limited to counsel,  
25 defendants, investigators, paralegals, experts and other individuals who have been appointed by the  
26 Court to represent the signatory defendants, and who shall be provided with a copy of this Order.

1 **IT IS FURTHER ORDERED** that:

2 While the Defendants may view the videos of these transactions, they shall not be  
3 provided with a copy of these materials. Furthermore, none of these materials may be publically  
4 displayed or disseminated, except when used in direACTION connection with legal proceedings before  
5 this Court. There shall be no further dissemination of these materials unless and until such time as  
6 the Government agrees to such disclosure and/or it is ordered by the Court.

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8 DATED this 12 day of June, 2012.

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12 UNITED STATES MAGISTRATE JUDGE

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